

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Criminal No. 23-20346

v.

Honorable Matthew F. Leitman

D-1 Afram Kourkis Baka,

Violations: 21 U.S.C. § 841
18 U.S.C. § 1956(h)

Defendant.

Superseding Information

The United States Attorney charges that:

Count One
Possession of Cocaine with Intent to Distribute
21 U.S.C. § 841(a)(1)

On or about January 31, 2021, in the Eastern District of Michigan, the defendant, Afram Kourkis Baka, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the controlled substance involved was a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

Count Two
Possession of Heroin with Intent to Distribute
21 U.S.C. § 841(a)(1)

On or about January 31, 2021, in the Eastern District of Michigan, the defendant, Afram Kourkis Baka, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the controlled substance involved was a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

Count Three
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956(h)

From in or around December 2019, through in and around January 2023, in the Eastern District of Michigan, and elsewhere, the defendant, Afram Kourkis Baka, knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed with others both known and unknown to the U.S. Attorney to commit an offense defined in Title 18, United States Code, Sections 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, that is, possession with intent to distribute controlled

substances, knowing that the transaction was designed in whole and in part to avoid a transaction reporting requirement under State or Federal law, and knowing, while conducting and attempting to conduct such financial transaction, that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

Forfeiture Allegations

**Criminal Forfeiture
21 U.S.C. § 853; 18 U.S.C. § 982(a)(1)**

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Codes, Section 982(a)(1) and Federal Rule of Criminal Procedure 32.2.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, Afram Kourkis Baka, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of the offense in violation of Title 18, United States Code, Section 1956(h), the

defendant, Afram Kourkis Baka, shall forfeit to the United States of America, any property, real or personal, involved in such offense, and any property traceable to such property.

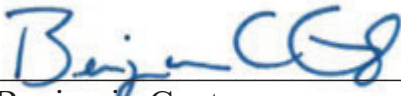
Forfeiture also includes the imposition of a forfeiture money judgment against the defendant, in favor of the United States, representing the value of property involved in the offenses of conviction.

If any of the property described above, as a result of any act or omission of the defendant:

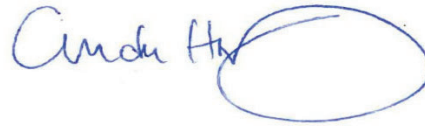
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dawn Ison
United States Attorney



Benjamin Coats
Chief, Drug Task Force Unit

A handwritten signature in blue ink, appearing to read "Andrea Hutting", followed by a large, loopy circular flourish.

Andrea Hutting
Rajesh Prasad
Assistant United States Attorneys
211 W. Fort St, Suite 2001
Detroit, MI 48226
andrea.hutting@usdoj.gov

Dated: November 8, 2024

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 23-20346
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: s/RP

Case Title: USA v. Afram Kourkis Baka

County where offense occurred : Monroe County and elsewhere

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☒ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 23-20346 **Judge:** Matthew F. Leitman

- ☐ Corrects errors; no additional charges or defendants.
☒ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 8, 2024
Date

s/Rajesh Prasad

Rajesh Prasad, Assistant U.S. Attorney
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 Attorney Bar #: P68519

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.